

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

NIC SALOMON,

Plaintiff,

vs.

KROENKE SPORTS & ENTERTAINMENT,
LLC, OUTDOOR CHANNEL HOLDINGS,
INC. AND PACIFIC NORTHERN CAPITAL
LLC,

Defendants.

Civil Action No. 3:15-CV-00666-M

**APPENDIX IN SUPPORT OF PLAINTIFF NIC SALOMON'S BRIEF IN OPPOSITION
TO DEFENDANTS KROENKE SPORTS & ENTERTAINMENT, LLC AND OUTDOOR
CHANNEL HOLDINGS, INC.'S MOTION PURSUANT TO FED. R. EVID. 702 TO
EXCLUDE TESTIMONY OF KEVIN KREITZMAN AND REQUEST FOR HEARING**

<u>Exhibit No.</u>	<u>App. No.</u>	<u>Document Description</u>
1	App.0001-5	April 17, 2012 Non-Disclosure Agreement [Salomon000001-4]
2	App.0006-8	September 28, 2012 preliminary Letter of Interest to Tim McQuay from Kelly R. Holowaty [004096-4097]
3	App.0009-29	Excerpts of February 12, 2013 FORM DEFM14A Proxy Statement of Outdoor Channel Holdings Inc. Regarding Proposed Plan of Merger With InterMedia Outdoor Holdings, Inc. (Depo. Ex. 367) [KSE/OC:028348-28356, 28436-28446]
4	App.0030-36	February 26, 2013 e-mail string, with attachments, from T. McQuay to J. Holowaty, K. Holowaty and N. Salomon re Revised PNC Term Sheet [KSE/OC:000240-245]
5	App.0037-43	February 27, 2013 e-mail string, with attachments, from J. Holowaty to T. McQuay re signed Revised PNC Term Sheet [KSE/OC:000255-260]

6	App.0044-48	February 26, 2013 Letter to T. McQuay re revised Term Sheet (Depo. Ex. 302) [KSE/OC:000947-950]
7	App.0049-53	February 27, 2013 press release entitled: KSE Delivers Proposal to OUTD (Depo. Ex. 300) [KSE/OC030880-30883]
8	App.0054-55	March 5, 2013 e-mail, with attachments, from T. McQuay to J. Holowaty, K. Holowaty and N. Salomon re Aerial cameras [KSE/OC:000273]
9	App.0056-59	March 7, 2013 e-mail, with attachments, from T. Hornish to group of 18 individuals re press release [KSE/OC:000275-277]
10	App.0060-61	March 15, 2013 e-mail string, with attachments, from J. Holowaty to T. McQuay re APA Comments [KSE/OC:000303]
11	App.0062-64	March 18, 2013 e-mail string from T. McQuay to J. Holowaty, K. Holowaty and N. Salomon re Outdoor Channel's responses to your markup of the APA [KSE/OC:000367-368]
12	App.0065-67	March 21, 2013 letter amendment to Pacific Northern Capital [KSE/OC:028341-28342]
13	App.0068-70	March 21, 2013 e-mail string from J. Martin to D. Gluck re Outdoor (Depo. Ex. 305) [KSE/OC:052782-52783]
14	App.0071-75	Review, Analysis and Recommendation Re Aerial Camera Business (Depo. Ex. 306) [KSE/OC:000608-611]
15	App.0076-78	March 25, 2013 e-mail string from J. Holowaty to N. Salomon re Update [Salomon000067-68]
16	App.0079-81	March 27, 2013 e-mail string from T. McQuay to F. Penafiel, R. Campbell, C. Lee and T. Hornish re Follow Up Executed LOI [KSE/OC:061353-61354]
17	App.0082-85	April 15, 2013 e-mail string from N. Salomon to J. Holowaty re Amendment to PNC LOI-3-21-13 [Salomon002316-18]
18	App.0086-95	April 30, 2013 e-mail string from T. Hornish to D. Gluck re Skycam product approval request for PICO (Depo. Ex. 311) [KSE/OC:052812-52819]
19	App.0096-99	May 17, 2013 e-mail, with attachments, from K. Hopkins to C. Lee, R. Brown, T. Allen and T. Hornish re Kroenke Acquisition press release cross time (Depo. Ex. 348) [KSE/OC:062208-62210]
20	App.0100-104	May 17, 2013 e-mail, with attachments, from N. Salomon to D. Gluck re NFL/SKYCAM – Confidential Executive Summary (Depo. Ex. 314) [KSE/OC:00413-416]

21	App.0105-116	July 3, 2013 e-mail string, with attachments, from B. Glazer to S. Long re Aerial Camera Business (Depo. Ex. 351) [KSE/OC:031070-31080]
22	App.0117-122	August 6, 2013 e-mail, with attachments, from N. Salomon to J. Martin, J. Liberatore, and D. Gluck (Depo. Ex. 333) [KSE/OC:052705-52709]
23	App.0123-137	December 18, 2017 Answers of Kroenke Sports & Entertainment, LLC to Plaintiff Nick Salomon's First Set of Interrogatories
24	App.0138-140	November 15, 2012 OUTD Disclosure Schedule [KSE/OC:029563 and KSE/OC:029654]
25	App.0141-143	March 22, 2013 e-mail string from T. Allen to T. Hornish re Deferred Revenues – ESPN (Depo. Ex. 343) [KSE/OC:043020-43021]
26	App.0144-201	September 14, 2018 Expert Report of Kevin Kreitzman, MBA
27	App.0202-241	October 12, 2018 Rebuttal Expert Report of Karyl M. Van Tassel, CPA
28	App.0242-251	October 31, 2018 Answers of Kroenke Sports & Entertainment, LLC and Outdoor Channel Holdings, Inc. to Plaintiff Nic Salomon's Written Deposition Questions
29	App.0252-300	Excerpts from the transcript of deposition of David Gluck, taken on August 22, 2018
30	App.0301-355	Excerpts from the transcript of deposition of James Martin, taken on August 30, 2018
31	App.0356-362	Excerpts from transcript of deposition of Scott M. Long, taken on September 5, 2018
32	App.0363-369	Declaration of Nic Salomon
33	App.0370-375	Declaration of Ahmed Ibrahim

Respectfully submitted,

Dated: December 7, 2018

By: /s/ Ahmed Ibrahim
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ATTORNEYS FOR PLAINTIFF NIC SALOMON

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this filed pleading is being served upon all counsel of record through the Court's ECF delivery system, as provided by the Local Rules at or shortly after the time and date of filing.

Dated: December 7, 2018

/s/ Ahmed Ibrahim

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